

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

HILDA BRUCKER; JEFFERY  
THORNTON; JANICE CRAIG; and  
BYRON BILLINGSLEY,

Plaintiffs,

vs.

THE CITY OF DORAVILLE, a Georgia  
municipal corporation,

Defendant.

Civil Action No.

1:18-cv-02375-RWS

**DECLARATION OF ANTHONY  
SANDERS IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746(2), I, Anthony Sanders, declare the following:

1. I am a citizen of the United States and a resident of the state of Minnesota. I am over eighteen years of age and fully competent to make this declaration. I knowingly and voluntarily submit this declaration in support of Plaintiffs' Motion for Summary Judgment based on my personal knowledge of the

following facts and would competently testify to them under oath if called upon to do so.

2. I am an attorney with the Institute for Justice, which represents the Plaintiffs in the above-captioned action challenging the constitutionality of Defendant City of Doraville's policy and practice of ticketing, prosecuting, and fining individuals to generate revenue.

3. Attached at Exhibit 1 is a true and correct copy of excerpts and accompanying exhibits from the transcript from the March 12, 2020, Rule 30(b)(6) deposition of Edward Carter, a designee for the City of Doraville.

4. Attached at Exhibit 2 is a true and correct copy of excerpts and accompanying exhibits from the transcript from the January 14, 2020, Rule 30(b)(6) deposition of Richard Platto, a designee for the City of Doraville.

5. Attached at Exhibit 3 is a true and correct copy of excerpts and accompanying exhibits from the transcript from the March 12, 2020, Rule 30(b)(6) deposition of Bill Riley, a designee for the City of Doraville.

6. Attached at Exhibit 4 is a true and correct copy of excerpts and accompanying exhibits from the transcript from the March 13, 2020, Rule 30(b)(6) deposition of Corally Rivera, a designee for the City of Doraville.

7. Attached at Exhibit 5 is a true and correct copy of excerpts and accompanying exhibits from the transcript from the May 18, 2020, Rule 30(b)(6) deposition of Shawn Gillen, a designee for the City of Doraville.

8. Attached at Exhibit 6 is a true and correct copy of excerpts and accompanying exhibits from the transcript from the May 19, 2020, Rule 30(b)(6) deposition of John King, a designee for the City of Doraville.

9. Attached at Exhibit 7 is a true and correct copy of excerpts and accompanying exhibits from the transcript from the May 26, 2020 deposition of Donna Pittman.

10. On May 13, 2020, Plaintiffs served Defendant with Plaintiffs' Special Interrogatories in Lieu of Testimony Under Rule 30(b)(6). On May 21, 2020, Defendant responded. Attached at Exhibit 8 is a true and correct copy of those responses.

11. On September 11, 2019, Plaintiffs served Defendant with their First Set of Requests for Admission. On October 25, 2019, Defendant responded. Attached at Exhibit 9 is a true and correct copy of those responses.

12. On September 11, 2019, Plaintiffs served Defendant with their First Set of Requests for Production of Documents. On October 25, 2019, Defendant

responded and on November 17, 2019, Defendant partially produced the requested documents. Attached at Exhibit 10 is a true and correct copy of an excerpt from those documents.

Executed this 24th day of July, 2020.

By:

A handwritten signature in black ink, consisting of stylized, cursive letters that appear to read 'AS' followed by a large, circular flourish.

Anthony Sanders